

Richard W. Osman, State Bar No. 167993
Sheila D. Crawford, State Bar No. 278292
BERTRAND, FOX, ELLIOT, OSMAN & WENZEL
2749 Hyde Street
San Francisco, California 94109
Telephone: (415) 353-0999
Facsimile: (415) 353-0990
Email: rosman@bfesf.com
scrawford@bfesf.com

Attorneys for Defendants
CITY OF VACAVILLE, JULIE BAILEY,
CHUCK BAILEY, DUSTIN WILLIS,
and DAVE SPENCER

Fulvio F. Cajina, State Bar No. 289126
LAW OFFICE OF FULVIO F. CAJINA
528 Grand Avenue
Oakland, CA 94610
Telephone: (415) 601-0779
Facsimile: (510) 225-2636
Email: fulvio@cajinalaw.com

Stanley Goff, State Bar No. 289564
LAW OFFICE OF STANLEY GOFF
15 Boardman Place Suite 2
San Francisco, CA 94103
Telephone: (415) 571-9570
Email: scraiggoft@aol.com

Attorneys for Plaintiffs
CARMEL GARCIA, M.Y. AND L.Y., minors
by and through their guardian ad litem
VANESSA RUIZ; L.Y., a minor by and
through his guardian ad litem FRANCISCA
URIOSTEGUI

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CARMEL GARCIA, an individual; M.Y. AND
L.Y., minors by and through their guardian ad
litem VANESSA RUIZ; L.Y., a minor by and
through his guardian ad litem FRANCISCA
URIOSTEGUI,

Plaintiff,

v.

YUBA COUNTY SHERIFF'S
DEPARTMENT; YUBA COUNTY
SHERIFF'S DEPUTIES DOES 1-5; CITY OF
VACAVILLE; and VACAVILLE POLICE
OFFICER DOES 6-10;

Defendants.

Case No. 2:19-cv-02621-KJM-DB

**EIGHTH STIPULATED REQUEST TO
CONTINUE PRE-TRIAL DEADLINES; ORDER**

Judge: Kimberly J. Mueller

WHEREAS, Plaintiffs CARMEL GARCIA, M.Y. AND L.Y., minors by and through their guardian ad litem VANESSA RUIZ; L.Y., a minor by and through his guardian ad litem FRANCISCA URIOSTEGUI, (“Plaintiffs”) initiated this case on March 11, 2020 (Dkt. No. 1.1);

WHEREAS, Plaintiffs named the CITY OF VACAVILLE, JULIE BAILEY, CHUCK BAILEY, DUSTIN WILLIS, and DAVE SPENCER as Defendants (collectively, “Defendants”);

WHEREAS, on September 6, 2022, the Parties filed a seventh stipulation to continue pretrial deadlines to provide time to complete multiple depositions;

WHEREAS, on September 6, 2022, the Court issued an order granting the Parties’ stipulated request to continue pretrial deadlines (Dkt. No. 67);

WHEREAS, Defendants filed a motion for summary judgment, which is set to be heard on November 4, 2022;

WHEREAS, the Parties agreed to attend a settlement conference with Magistrate Judge Carolyn Delaney before the motion for summary judgment is heard and a settlement conference is scheduled for October 31, 2022;

WHEREAS, considering the Parties will be attending a settlement conference on October 31, 2022, they seek to continue expert discovery deadlines to avoid incurring additional expenses associated with expert discovery;

WHEREAS, this stipulation is not made for any improper purpose and will not prejudice any Party; and

WHEREAS, the requested modifications will not otherwise impact the trial date for the case as none has been set.

STIPULATION

NOW, THEREFORE, Plaintiffs and Defendants stipulate and request the court continue presently set pre-trial dates as follows:

Event	Current Deadline	Proposed Deadline
All Dispositive Motions Hearing Date	November 4, 2022	No Change
Expert Disclosures	November 14, 2022	January 20, 2023
Supplemental Experts	November 28, 2022	February 3, 2023
Completion of Expert Discovery	December 12, 2022	March 3, 2023

1 Dated: October 13, 2022

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

2 By: /s/ Richard W. Osman

Richard W. Osman

3 Sheila D. Crawford

Attorney for Defendants

4 CITY OF VACAVILLE, JULIE BAILEY,

5 CHUCK BAILEY, DUSTIN WILLIS, and DAVE
SPENCER

6 Dated: October 12, 2022

LAW OFFICES OF FULVIO F. CAJINA

7 By: /s/ Fulvio Cajina

8 Fulvio F. Cajina

Attorney for Plaintiffs

9 CARMEL GARCIA, M.Y. AND L.Y., minors by and
through their guardian ad litem VANESSA RUIZ;

10 L.Y., a minor by and through his guardian ad litem
FRANCISCA URIOSTEGUI

11
12 **ELECTRONIC CASE FILING ATTESTATION**

13 I, Richard W. Osman, hereby attest that I have on file all holograph signatures for any signatures
14 indicated by a conformed signature (“/s/”) within this E-filed document or have been authorized by
15 counsel to show their signature on this document as /s/.

16 Dated: October 13, 2022

By: /s/ Richard W. Osman

17 Richard W. Osman

ORDER

Pursuant to the parties' stipulation and good cause appearing, it is so ordered:

The pre-trial deadlines are continued as follows:

Event	Current Deadline	Proposed Deadline
All Dispositive Motions Hearing Date	November 4, 2022	No Change
Expert Disclosures	November 14, 2022	January 20, 2023
Supplemental Experts	November 28, 2022	February 3, 2023
Completion of Expert Discovery	December 12, 2022	March 3, 2023

DATED: October 13, 2022.


CHIEF UNITED STATES DISTRICT JUDGE